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EXHIBIT C
TO
PLAINTIFFS' COMPLAINT

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September 17, 2019

BY E-MAIL

**CERTIFIED MAIL –
RETURN RECEIPT REQUESTED**

Federal Bureau of Investigation
Record/Information Dissemination Section
Records Management Division
170 Marcel Drive
Winchester, VA 22602
foipaquestions@fbi.gov / [REDACTED]

Re: FOIA Request #1355904-001

Dear Ms. Wilson:

My firm was recently retained as new counsel for Steven A.W. De Jaray and Perienne de Jaray (collectively, “Requestors”). In August 2016, Requestors filed a FOIA Request subsequently denominated by your agency as #1355904-001, which sought FBI records related to Requestors and several business entities.¹ On June 20, 2017, the FBI identified that it has 1,518 potentially responsive records. Requestors offered and continue to offer to pay any reasonable fees associated with having those records reviewed and released. The statutory deadline to produce responsive records to their request is long past due. Indeed, as far as we can tell from the FBI FOIA database, no Government Information Specialist has even been assigned yet to analyze the propriety of releasing these 1,518 documents to Requestors.

As you are aware, FOIA imposes strict deadlines on federal agencies when they receive a request for records pursuant to FOIA. An agency must determine whether to disclose responsive records and notify the requester of its determination within 20 working days of receiving a FOIA request. 5 U.S.C. § 552(a)(6)(A). An agency may extend the 20-working-day deadline for an additional 10 working days by giving a written notice to the requester that sets forth “unusual circumstances” to justify a deadline extension, which also requires that it provide the date by which the agency expects to make the determination. *Id.* § 552(a)(6)(B)(i).

¹ This request was submitted by Requestors’ prior counsel.

Philip J. Bezanson
Managing Partner, Seattle

T: +1.206.204.6206 F: +1.800.404.3970
701 Fifth Avenue, Suite 6200, Seattle, Washington 98104-7018
philip.bezanson@bracewell.com bracewell.com

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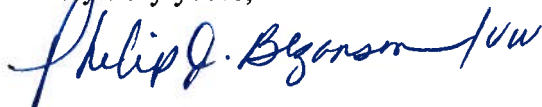
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The FBI must also make the responsive records “promptly” available, unless it can establish that certain unusual circumstances are present or that it may lawfully withhold records, or portions thereof, from disclosure. *Id.* § 552(a)(6). The FBI has woefully failed to comply with its statutory obligations in handling this request. Please confirm, in writing, that this request will be fully processed and responsive records released to Requestors by October 17, 2019. If all responsive records have not been produced by that accommodative deadline, which is far beyond what statutes require, Requestors will be forced to pursue more formal legal relief to protect their rights with respect to this request.

Please contact me if you have any questions.

Very truly yours,

A handwritten signature in blue ink that reads "Philip J. Bezanson" followed by a stylized flourish.

Philip J. Bezanson
Managing Partner, Seattle Office

PJB/ds

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